

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHADDE GHNEIM, an individual,

Plaintiff,

v.

CELLCO PARTNERSHIP, d/b/a Verizon
Wireless, a Delaware partnership,

Defendant.

Case No. 2:17-cv-01117 RSL

**JOINT MOTION FOR
CONTINUANCE OF DISCOVERY
CUTOFF DEADLINE DATES; AND
ORDER CONTINUING DISCOVERY
CUTOFF DEADLINE**

NOTING DATE: AUGUST 24, 2018

I. JOINT MOTION

COMES NOW Shadde Ghneim and Cellco Partnership dba Verizon Wireless (collectively, "Parties"), by and through their counsel of record, and respectfully move this Court for entry of the subjoined Order Continuing Discovery Cutoff Deadline. In support of this Joint Motion, the Parties stipulate and agree as follows:

1. This action involves Plaintiff's employment claims against Defendant for alleged violations of Title VII of the Civil Rights Act of 1964 and the Washington Law Against Discrimination. The Parties have been engaged in active discovery since August 2017.

1 2. The Parties previously obtained a short continuance of trial date and related dates
2 that moved the deadline by which discovery must be completed from July 18, 2018 to September
3 7, 2018.

4 3. After the Court issued its Order granting that continuance, the parties promptly
5 scheduled several depositions to occur in late August and early September.

6 4. In advance of out of state depositions set to occur on August 30 and 31, 2018, the
7 parties held a settlement conference between counsel on August 22 and 24, 2018.

8 5. Given the parties' relative positions regarding settlement, the parties agreed that it
9 made sense to schedule a mediation at the earliest opportunity. Based on client, counsel, and
10 mediator availability, the first available mediation date is September 28, 2018.

11 6. The Parties further agreed that in the interest of economy and efficiency, it makes
12 sense to postpone the currently scheduled depositions until after a mediation.

13 7. The Parties have conferred in good faith and have agreed that the discovery cutoff
14 deadline should be extended to October 19, 2018 so that the parties can still complete necessary
15 depositions in the event the case does not resolve at or near the time of mediation.

16 8. The Parties further agree that the short continuance of the discovery cutoff
17 deadline would not disrupt the current trial date or related pretrial deadlines.

18 9. As a result of the foregoing, the Parties request that this Court enter an order that
19 Discovery shall be completed by **October 25, 2018**.

20 10. The Parties bring this Motion in good faith and without intent to cause undue
21 delay, prejudice, or expense on any other party or this Court.
22

1 WHEREFORE, the Parties respectfully request that this Court enter the Order Continuing
2 the Discovery Cutoff Deadline.

3
4 DATED this 24th day of August, 2018.

DATED this 24th day of August, 2018.

5 CORR DOWNS PLLC

JACKSON LEWIS P.C.

6 s/ Jacob M. Downs

7 Jacob M. Downs, WSBA #37982
8 Robert L. Gillette, WSBA #44212
9 Attorneys for Plaintiff

s/ Barry Alan Johnsrud


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Attorneys for Defendant

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II. ORDER

It is so ordered.

Dated this 17* day of Sept. ~~August~~, 2018.


UNITED STATES DISTRICT JUDGE
Honorable Robert L. Lasnik